



800 MHZ

Arizona Regional Review Committee

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**COMMENTS**  
**Before the**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**445 12th Street, S.W.,**  
**Washington, DC 20554**  
**FCC WT Docket 05-157**  
**April 28<sup>th</sup>, 2005**

**In the Matter of**  
**Spectrum Needs of Emergency**  
**Response Providers**  
**Intelligence Reform and Terrorism Prevention Act of 2004**  
**Docket No. 05-157**

The Arizona Regional Review Committee (ARRC) is an 11 member organization responsible for the six megahertz of NPSPAC spectrum devoted to Region 3. The committee met on April 28, 2005 to discuss various issues relating to public safety entities and radio spectrum needs. Listed below are topics that are important to public safety agencies in Arizona and need further consideration by the FCC.

The international border communities have the same spectrum needs for voice, and data communication as those that serve any large population centers in the center portion of the U.S.A. In addition, public safety in the border area has the added burden of policing our borders and monitoring the international trade traffic, this adds significant additional spectrum needs for public safety in the border area. At this time public safety in the border areas are forced to work with about 2/3 the 800 MHz band spectrum found in the heartland area of the country. This limited amount of spectrum has already proven to be inadequate and impedes the implementation of interoperable systems that are planned.

The Mexican border area is vital to both national security and the nation's economy. National security demands require that public safety entities in the border areas have sufficient spectrum to perform their critical tasks, both with respect to communications between U.S. entities and between the U.S. and public safety services in Mexico.

The Tucson - Nogales corridor is the gateway to Mexico in Arizona. The Nogales port of entry is the one of the busiest ports of entries from the U.S. to Mexico. Over 3.5 billion pounds of produce flow, by truck, through this port of entry every year. Just considering the legal border crossings and legal trade that pass through our border communities, this traffic has a significant impact on the US economy. Radio communications are vital to management of this sizable international trade.

As border security operations increase there will be a need for dedicated cross border mutual aid channels. Additional international mutual aid channels would be desirable. At this time the limited number of 800 band mutual aid channels are shared for both internal and international mutual aid.

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Chairperson: Larry Sayers

Vice-Chairperson: Harold Pierson

Sec./Treas.: Phil Cook

It is our understanding that the 700 band public safety spectrum allocation in the US does not have interference protection from Mexican UHF TV stations across the border. At this time the international agreement with Mexico<sup>1</sup> allows either country to install UHF TV stations only subject to coordination with other UHF TV stations within 199 miles of both sides of the border. The US will be decommissioning TV stations on channels 60 through 69; this may actually allow Mexican stations to start transmitting on these channels near our border. Therefore extensive public safety use of the 24MHz of 700 band spectrum (TV channels 63, 64, 68, 69) needs to be secured by an international treaty for use in our border areas.

An addition of 12 to 24 MHz of public safety spectrum in the upper 700 band would be desirable to make the current 700 MHz allocation and the current 800 MHz bands contiguous and eliminate the problems associated with the proximity of commercial providers. Using the same band plan for this new block as the other 700 band make this desirable spectrum, because the wide band plan and extended propagation characteristics, for monitoring and policing our extensive border in remote, sparsely populated areas of the state. Thus additional spectrum that can be utilized with already implemented equipment can provide the benefits to the public in the most rapid and cost efficient manner.

Lack of suitable spectrum has forced many public safety entities to use the resources of commercial wireless providers. This is a dangerous practice that has continued to expand and spread. Commercial wireless providers favor the masses and do not lend themselves to the same backup power, site security and redundancy measures employed by dedicated and closed public safety radio networks. Relief, in the form of additional spectrum, must be provided to stop and reverse this trend.

#### Summary:

- The border areas must have the same or more spectrum allocated to public safety as in the heartland area.
  - It is estimated that in the not too distant future, we can fully utilize all of the 12MHz (after rebanding) in the 800 MHz band, for interoperable public safety voice and dispatch operations.
  - For extensive high data rate mobile data functions in the patrol car, it is anticipated that the 24 MHz in the 700 band will be utilized extensively.
  - The growing use of commercial wireless providers for emergency services must be given relief by additional spectrum.
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- Special operations such as border patrol and border monitoring will require additional spectrum for high speed data, video, and other new and upcoming technologies. Due to range requirements, equipment capability, and implementation considerations, this additional spectrum could best be utilized in the upper 700 band.

Respectively submitted,

Larry Sayers  
Arizona Regional Review Committee Chair

<sup>1</sup> Reference Mexican international agreement for Broadcast television UHF signed June 18<sup>th</sup> 1983. This document is found on the FCC web page: \*\*\*<http://www.fcc.gov/ib/sand/agree/files/mex-bc/uhftvbc.pdf>\*\*\*